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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PROFESSIONAL FINANCIAL INVESTORS,
INC., *et al.*,

Debtors.

Case No. 20-30604

(Jointly Administered)

Chapter 11

**NOTICE OF FOURTH OMNIBUS
OBJECTION TO CLAIMS**

Date: March 3, 2022
Time: 10:00 a.m.
Judge: Hon. Hannah L. Blumenstiel
Place: Telephonic/Video Appearances
Only

**TO THE HONORABLE HANNAH L. BLUMENSTIEL AND CLAIMANTS ON EXHIBIT 1
HERETO FOR WHOM INDIVIDUALIZED NOTICES WERE SERVED PURSUANT TO
PROCEDURES APPROVED BY THE COURT:**

On January 24, 2022, the PFI Trust filed its *Fourth Omnibus Objection to Claims (Tenant Security Deposit Claims)* (the "Omnibus Objection") with the United States Bankruptcy Court for the Northern District of California (San Francisco Division) (the "Bankruptcy Court"). [A full copy of the Omnibus Objection may be obtained at no cost, as provided below.]

By the Omnibus Objection, the PFI Trust seeks to disallow one or more of your Proof(s) of Claim listed above on the grounds that the Proof(s) of Claim is not a current liability of the Debtors in that either: (1) the security deposit was already returned to Claimant and has been satisfied, or (2) the security deposit is now possessed, and liability on account thereof has been assumed, by Hamilton Zanze & Company, the tenant's new landlord.

Any Proof of Claim that the Bankruptcy Court disallows will be treated as if it had not been filed and you will not be entitled to any distribution on account thereof.

1 The Bankruptcy Court will hold a hearing on **March 3, 2022, at 10:00 a.m. (Pacific Time)**
2 (the “Hearing”) before the Honorable Hannah Blumenstiel, United States Bankruptcy Judge. **The**
3 **Omnibus Hearing will be conducted by videoconference.** The courtroom will be closed. All
4 parties who wish to appear at the Hearing should consult the Bankruptcy Court’s website at
5 www.canb.uscourts.gov for information about court operations during the COVID-19 pandemic.
6 The Bankruptcy Court’s website provides information regarding how to arrange a telephonic or
video appearance. If you have any questions regarding how to appear at a court hearing, you may
contact the Bankruptcy Court by calling 888-821-7606 or by using the Live Chat feature on the
Bankruptcy Court’s website.

7 If you **DO NOT** oppose the disallowance or reduction of your Proof(s) of Claim listed above,
8 then you do NOT need to file a written response to this Omnibus Objection and you do NOT need to
appear at the Hearing.

9 If you **DO** oppose the disallowance or reduction of your Proof(s) of Claim listed above, then
10 you **MUST** file a response (a “Response”), in writing, with the Bankruptcy Court, and serve it on the
11 counsel for the PFI Trust at the above-referenced addresses so as to be received by no later than **4:00**
12 **p.m. (Pacific Time) on February 17, 2022. The relief requested in the Omnibus Objection may**
be granted without a hearing if no opposition is timely filed and served in accordance with the
Case Management Order.

13 The Response must, at a minimum, include the following: (i) a caption setting forth the name
14 of the Bankruptcy Court, the name of the Debtor, the case number and title of the Omnibus
15 Objection to which the Response is directed; (ii) your name, the assigned number(s) of your Proof(s)
16 of Claim, and an explanation for the amount of the Proof(s) of Claim; (iii) a concise statement
17 setting forth the reasons why the Bankruptcy Court should not sustain the Omnibus Objection,
18 including, without limitation, the specific factual and legal bases upon which you will reply in
19 opposing the Omnibus Objection; (iv) a copy of any other documentation or other evidence of the
20 Proof of Claim, to the extent not already included with the Proof of Claim, upon which you will rely
21 in opposing the Omnibus Objection at the hearing; (v) a declaration under penalty of perjury of a
22 person with personal knowledge of the relevant facts that support the Response; (vi) your name,
23 address, telephone number, and/or the name, address, and telephone number of your attorney and/or
designated representative to whom counsel for the Debtors should serve a reply to the Response, if
any; and (vii) the name, address, telephone number, and email address of the party with authority to
reconcile, settle, or otherwise resolve the Omnibus Objection on your behalf, if any.

24 If the Bankruptcy Court does not disallow or reduce your Proof(s) of Claim listed above, then
25 the PFI Trust will still have the right to object to your Proof(s) of Claim on other grounds at a later
26 date. You will receive a separate notice of any such objection.

27 Copies of the complete Omnibus Objection and other pleadings and documents identified
28 herein can be viewed and/or obtained by: (i) free download from on the Debtors’ approved notice
and claim agent’s website at [https:// https://www.donlinrecano.com/pfi](https://https://www.donlinrecano.com/pfi); (ii) accessing the
Bankruptcy Court’s website at <http://www.canb.uscourts.gov> [PACER account required], or (iii) by
mail (for free) by calling Donlin Recano at 1-877-283-0316 (Toll Free) and asking to have a
complete copy of the Omnibus Objection, including all Exhibits mailed to you, or by email at
pfiinfo@donlinrecano.com requesting copies of the Omnibus Objection, including all Exhibits.

1 Dated: January 24, 2022

PACHULSKI STANG ZIEHL & JONES LLP

2
3 By /s/ Debra I. Grassgreen

4 Debra I. Grassgreen

5 John D. Fiero

6 Cia H. Mackle

7 Attorneys for Michael I. Goldberg,
8 Trustee of the PFI Trust
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EXHIBIT 1

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SAN RAFAEL, CA 94903

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